IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

STATE OF DELAWARE : CRA #S23-03- thru

:

v.

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JERRY SODANO : INDICTMENT

ID #2302011216 : <u>BY THE GRAND JURY</u>

The Grand Jury charges that **JERRY SODANO** did commit the following offenses, to wit:

COUNT 1 - SEXUAL ABUSE OF CHILD BY PERSON IN POSITION OF TRUST, AUTHORITY OR SUPERVISION FIRST DEGREE – \$23-03-

JERRY SODANO, on or about and between the 1st day of August, 2016, and the 7th day of October, 2016, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse (cunnilingus) with who had reached her sixteenth birthday but had not reached her eighteenth birthday and the defendant was at least four years older than her, and the defendant stood in a position of trust, authority or supervision over the child or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child, in violation of Title 11, Section 778(3) of the Delaware Code.

COUNT 2 - SEXUAL ABUSE OF CHILD BY PERSON IN POSITION OF TRUST, AUTHORITY OR SUPERVISION FIRST DEGREE – S23-03-

JERRY SODANO, on or about and between the 8th day of October, 2016, and the 9th day of October, 2016, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse (penile/vaginal) with who had reached her sixteenth birthday but had not reached her eighteenth birthday and the defendant was at least four years older than her, and the defendant stood in a position of trust, authority or supervision over the child or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child, in violation of Title 11, Section 778(3) of the Delaware Code.

COUNT 3 - SEXUAL ABUSE OF CHILD BY PERSON IN POSITION OF TRUST, AUTHORITY OR SUPERVISION FIRST DEGREE – S23-03-

JERRY SODANO, on or about and between the 1st day of August, 2016, and the 10th day of January, 2017, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse (cunnilingus) with who had reached her sixteenth birthday but had not reached her eighteenth birthday and the defendant was at least four years older than her, and the defendant stood in a position of trust, authority or supervision over the child or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child, in violation of Title 11, Section 778(3) of the Delaware Code.

COUNT 4 - SEXUAL ABUSE OF CHILD BY PERSON IN POSITION OF TRUST, AUTHORITY OR SUPERVISION FIRST DEGREE – \$23-03-

JERRY SODANO, on or about and between the 8th day of September, 2016, and the 29th day of October, 2016, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse (penile/vaginal) with who had reached her sixteenth birthday but had not reached her eighteenth birthday and the defendant was at least four years older than her, and the defendant stood in a position of trust, authority or supervision over the child or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child, in violation of Title 11, Section 778(3) of the Delaware Code.

<u>COUNT 5 - SEXUAL ABUSE OF CHILD BY PERSON IN POSITION OF TRUST,</u> <u>AUTHORITY OR SUPERVISION FIRST DEGREE – S23-03-</u>

JERRY SODANO, on or about and between the 1st day of December, 2016, and the 31st day of December, 2016, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse (penile/vaginal) with who had reached her sixteenth birthday but had not reached her eighteenth birthday and the defendant was at least four years older than her, and the defendant stood in a position of trust, authority or supervision over the child or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child, in violation of Title 11, Section 778(3) of the Delaware Code.

COUNT 6 - CONTINUOUS SEXUAL ABUSE OF A CHILD - S23-03-

JERRY SODANO, on or about and between the 1st day of August, 2016, and the 10th day of January, 2017, in the County of Sussex, State of Delaware, while having recurring access to the child, did intentionally engage in three or more acts of sexual conduct with a child under the age of 18 years, over a period of time not less than 3 months in duration, in violation of Title 11, Section 776(a) of the Delaware Code.

A TRUE BILL		
FOREMAN	 	 Western
SECRETARY	 	

<u>s/KATHLEEN JENNINGS</u> ATTORNEY GENERAL

REBECCA E. ANDERSON DEPUTY ATTORNEY GENERAL

Dated: 03/13/2023

kmm